The applicant notes that the affidavits from skilled workers in the art attesting to the originality and novelty of the present invention previously provided in the response of February 23, 2005 were not addressed in the response of September 21, 2005. However, the applicant submits that the claims recite patentable subject matter even apart from the evidence in these affidavits.

Dolin teaches a system for installing and configuring network devices involving the fixation of node ID bar codes onto a paper floor plan. Each node ID bar code is associated with a network device that is fixed in the real-world at a location that corresponds to the location of the node ID bar code on the plan during installation of the network devices. The purpose of fixating the node ID bar codes onto a paper floor plan is to permit subsequent association of network devices at a central location by reading the node ID bar codes fixated to the paper plan to identify the network device at a particular location (col 10, ln 47-52).

The Examiner correctly notes that Dolin's bar codes are affixed to a floor plan. Dolin does not teach a plurality of labels "***physically associated with***" the fixtures. His labels are placed on ***a paper floor plan*** to show the layout of nodes in the system. In Dolin all maintenance of the system is effected from a single central control terminal; why would Dolin physically associate labels with his fixtures? The fixtures (nodes) are not maintained from their physical location, they are maintained from the central control station. Dolin teaches a completely different system having a completely different purpose, and this feature of the main claims is not taught or suggested by Dolin.

Hirata et al. makes plant information required for the inspection of a plant accessible to maintenance personnel. This is all Hirata does that is relevant to the present invention. The plant information is stored in a server to which a maintenance worker communicates using a portable terminal. The maintenance worker specifies the next plant to be inspected from his expected inspection route. Before starting the inspection the maintenance worker acquires the plant information required for the inspection and caches the information on the portable terminal. However, the plant inspection route is not based on the relative locations of immoveable fixtures, as claimed. At most, Hirata provides a means of obtaining information about the plant that is to be inspected.

As indicated by the Examiner, Hirata teaches that a maintenance worker has an expected inspection route. The maintenance worker selects the next plant on the expected inspection route to download the plant's information from the server onto the mobile device. Thus, not only does Hirata fail to teach a microprocessor appliance configured to generate a report with information specific to fixtures associated with labels read by a reader, Hirata fails to teach a report comprising a repair task route based on ***relative locations*** of fixtures. The expected inspection route is pre-determined before the maintenance worker accesses the server.

As indicated by the Examiner, Dolin fails to teach that the microprocessor appliance is configured to generate a report with information specific to light fixtures associated with the labels read by the reader. Hirata adds nothing to Dolin that is relevant to the claimed invention. The applicant submits that neither Dolin nor Hirata teach or suggest a report that comprises a repair task route based on relative locations of fixtures.

The applicant traverses the Examiner's assertion that it would have been obvious to an artisan of ordinary skill in the art at the time the invention was made to integrate the teachings of Hirata to the teachings of Dolin in order to provide the best route to go through all the planned maintenance, so that the repair or maintenance person may take the fastest, smoothest, and most efficient route to finish all his work in a faster manner. Hirata does not teach this, and in any event Dolin's system could not make use of such a feature because Dolin does not attend at the physical location of his nodes in order to configure (i.e. maintain) them.

Ultimately, neither Dolin nor Hirata teach bar code (or other) labels physically associated with a plurality of immoveable fixtures disposed in different locations, or the generation of a report that comprises a repair task route based on the relative locations of the fixtures physically associated with the labels. The applicant submits that the claimed elements are not taught or suggested in the cited art.

Finally, the applicant further disagrees with the combination of Dolin and Hirata at all, on the basis that there is nothing which suggests any motivation or desirability of combining the subject matter of these two references.

There can be no advantage to generating a repair task route in Dolin's system, since the node ID bar codes are not used in subsequent configuration and re-configuration of the network. The node ID bar codes are affixed to a paper plan and used once to store the ID's into the configuration device at the position selected on the configuration device (Fig. 7a). Subsequent configuration occurs on the configuration device by selecting configuration operations to perform on selected devices (Fig. 7b). The maintenance personnel does not visit individual network devices when configuring the network and does not re-read the node ID bar codes after they have been stored on the configuration device. The configuration manager configures and maintains the network by accessing the configuration device, a personal computer, at a single fixed location that retrieves node ID information from an internal store (col. 14, ln 18-22). Thus there is no utility in combining a repair task route to Dolin.

Just because a prior art device may be capable of modification by combining references, there must be a suggestion or motivation in the reference to do so (MPEP 2143.01). As indicated by the Examiner, Dolin is directed towards a system for installing and configuring household devices, but as illustrated in Figure 6, these devices are configured by a personal computer at a fixed location. The configuration manager configures and maintains the network devices by accessing a configuration device, a personal computer, ***at a single central location***. Hirata is directed toward making plant information required for the inspection of a plant accessible to maintenance personnel at a high speed. The maintenance worker downloads plant information from a central server onto a portable terminal prior to attending at the next plant on an expected plant inspection route. There is no motivation or suggestion in either reference that it would be desirable to combine a system for installing and configuring household devices from a central point with a system for making plant information accessible in a portable device. Since the configuration manager of Dolin manages the network devices from a fixed location, there is simply no point to combining the downloading of plant information onto a portable terminal with the use of node ID bar codes associated with nodes accessed from a single central location.

The applicant thus submits that the combination of Dolin and Hirata is unsupportable in the absence of such motivation to combine and utility in the references. However, at least two features recited in the main claims are not met by these references alone or combination: in

neither reference is there a plurality of labels "physically associated with" the fixtures; and in neither reference is a repair task route generated.

The applicant thus submits that the independent claims are patentable, and thus all claims are allowable. Favorable reconsideration and allowance of this application are therefore respectfully requested.

A Petition for an Extension of Time requesting an extension of two months for filing the subject response is enclosed. The Commissioner is authorized to charge any deficiency or credit any overpayment in the fees for same to our Deposit Account No. 500663. A signed copy of this page is enclosed if required for this purpose.

Executed at Toronto, Ontario, Canada, on February 6, 2006.

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Encl. Petition for Extension of Time (in duplicate)

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